

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Amendment of Parts 1, 21, 73, 74 and 101 of  
the Commission's Rules to Facilitate the  
Provision of Fixed and Other Advanced  
Services in the 2150-2162 and 2500-2690  
MHz Bands

Transforming the 2.5 GHz Band

WT Docket No. 18-120

**JOINT MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's rules, the Catholic Technology Network ("CTN") and the National EBS Association ("NEBSA") respectfully request an extension of time to file comments and reply comments in response to the above-referenced Notice of Proposed Rulemaking, which was released on May 10, 2018 ("**Notice**"). CTN and NEBSA propose an extension of the comment and reply comment deadlines to dates that are 45 days after the current deadlines (*i.e.*, to August 23, 2018 and September 20, 2018, respectively).

CTN is an association of Roman Catholic archdioceses and dioceses with Educational Broadband Service ("**EBS**") licenses that operate many of the largest parochial school systems in the United States. NEBSA is the professional association for the EBS community representing PreK-12 and post-secondary schools and other educational nonprofit entities holding EBS licenses. Together, CTN and NEBSA have participated in virtually every major proceeding involving EBS, and their views have helped frame and shape important communications policy issues concerning the use of wireless technology in education.

CTN and NEBSA welcome the Commission's decision to take action to license unassigned EBS spectrum. The footprint of EBS coverage essentially has been frozen at the level that existed in 1995, and licensing that spectrum can expand the benefits of EBS to more educational institutions. It can also accelerate the deployment of commercial 5G wireless networks to more Americans, particularly in rural areas that are not currently licensed.

In addition to seeking comment on licensing unassigned EBS spectrum, the Notice raises a host of other very significant issues about nearly all aspects of the EBS band. These issues include, among other things, proposals to (1) modify existing EBS geographic service areas, (2) allow the sale of existing EBS licenses to commercial entities, (3) revise existing EBS leasing rules, (4) change existing EBS performance and license renewal requirements, and (5) use incentive or other types of auctions to license EBS spectrum. These are complex and far-reaching issues that require careful consideration, analysis, and discussion. Therefore, we request additional time to develop and submit responsive and well thought out comments.

By extending the comment cycle for an additional 45 days, the Commission can ensure that the EBS community has an adequate opportunity to evaluate and respond to the important issues raised in the Notice. At the same time, the requested extension will help ensure that the Commission develops a complete record.

Respectfully submitted,

CATHOLIC TECHNOLOGY NETWORK NATIONAL EBS ASSOCIATION

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